

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

FCCI Insurance Company,

Plaintiff,

v.

Island Pointe, LLC, Leonard T. Browne, Christopher Union, NOVUS Architects, Inc. f/k/a SGM Architects, Inc., CRG Engineering, Inc., Complete Building Corporation, Mount Hawley Insurance Company, Interstate Fire and Casualty Company, Colony Specialty Insurance Company, United Specialty Insurance Company, American Safety Insurance Company, Alderman Construction, Inc., Cohen's Drywall Company, Inc., Kevin Mosley d/b/a Mosley Concrete Construction, Floyd Stanley Jr. d/b/a Stanley's Vinyl Fence Designs, Tri-County Roofing, Inc., Creekside of Charleston, Inc., American Residential Services, LLC d/b/a ARS/ Rescue Rooter Charleston, Atlantic Building Construction Services, Inc. n/k/a Atlantic Construction Services, Inc., Tallent and Sons, Inc., W C Services, Inc. D & S Services, Inc., Truteam, Inc. d/b/a Builder Services Group, Inc. d/b/a Gale Contractor Services Liberty Mutual Fire Insurance Company, Pennsylvania Lumbermens Mutual Insurance Company, Hartford Insurance Company, Pennsylvania National Mutual Casualty Insurance Company, Old Republic Insurance Company, Penn National Security Insurance Company, Certain Underwriters at Lloyd's London Subscribing to Policy No. ART002591, Certain Underwriters at Lloyd's, London Subscribing to

Civil Action

File No.: 2:17-cv-01976-RMG

**DEFENDANT UNITED SPECIALTY
INSURANCE COMPANY'S ANSWERS TO
LOCAL RULE 26.01 INTERROGATORIES**

Policy No. B#BURZFR, Catawba Insurance Company, Scottsdale Insurance Company, Nationwide Mutual Fire Insurance Company, West American Insurance Company, Firemen's Insurance Company of Washington, D.C., TAPCO Underwriters, Inc., Selective Insurance Company and Nationwide Mutual Insurance Company,
Defendants.

Defendant United Specialty Insurance Company ("this Defendant" or "USIC"), by and through its undersigned counsel, answers the Local Rule 26.01 Interrogatories of the Court as follows:

A. State the full name, address, and telephone number of all persons or legal entities who have a subrogation interest in each claim, and state the basis and extent of said interest.

RESPONSE: None known.

B. As to each claim, state whether it should be tried jury or nonjury and why.

RESPONSE: Non-jury trial for interpretation of multiple insurance policies.

C. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE: This Defendant is not publicly owned. The remaining inquiries are not applicable to this Defendant.

D. State the basis for asserting your claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE: Plaintiff brought the action in this division. This Defendant does not challenge the appropriateness of the division.

E. Is this action related to any other matter (civil or criminal) filed in this district? If so, provide (1) a short caption and full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose all cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any reason would entail substantial duplication of labor if heard by different judges.

RESPONSE: This Defendant is not aware of any related action filed in this district.

F. [Defendants Only] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification

RESPONSE: This Defendant is properly identified.

G. [Defendants Only] If you contend some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

RESPONSE: This Defendant does not contend that any other person or entity is liable to it.

[SIGNATURE BLOCK ON FOLLOWING PAGE]

HEDRICK GARDNER KINCHELOE & GAROFALO,
LLP

s/Joshua D. Shaw

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Columbia, South Carolina
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